

Massachusetts Food Ass’n v. Massachusetts Alcoholic Beverages Control Comm’n, 197 F.3d 560, 567 (1st Cir. 1999).

The Northeast Alliance (“NEA”) functions as a merger of American Airlines’ and JetBlue’s Boston and New York operations and poses a serious threat to competitive conditions in a number of relevant antitrust markets in the airline industry. Anticompetitive impacts of the NEA will cause significant harm—not just to the flying public, but to airline employees as well. As the certified collective bargaining representative for a major class of such employees—the more than 14,000 pilots who fly for American Airlines—the APA has a concrete interest in the outcome of this litigation. As *amicus curiae*, the APA will offer the unique and important perspective of one of American Airlines’ most important stakeholders. Specifically, the proposed amicus brief will assist the Court in understanding the NEA’s effects on *labor markets*, including not just antitrust harms in the “input” labor markets that mirror those in the “output” passenger markets but also how the NEA unlawfully enhances American Airlines’ bargaining leverage at the expense of its employees.

Based on the foregoing, the APA respectfully requests that the Court grant this motion and accept the accompanying *amicus curiae* brief.

September 23, 2022

Respectfully submitted,

/s/ Michelle C. Yau

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CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1, the Allied Pilots Association states that it is an unincorporated, independent labor union and has no parent corporation. The Allied Pilots Association further states that no publicly held company owns 10% or more of its stock.

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LOCAL RULE 7.1(a)(2) CERTIFICATION

I certify that, on September 20, 2022, Cohen Milstein contacted counsel for the plaintiffs and the defendants, respectively, in an attempt in good faith to reach agreement on this motion. Plaintiffs United States, Pennsylvania, Florida, District of Columbia, Virginia, Arizona, and Massachusetts do not object to the motion. Counsel for Plaintiff California has not responded. Defendants do not assent to the motion.

/s/ Michelle C. Yau

CERTIFICATE OF SERVICE

I hereby certify that, on September 23, 2022, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Michelle C. Yau